

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JEFFREY HALE, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

CREDITORS RELIEF LLC, a New Jersey
limited liability company.

Defendant.

Case No. 2:17-cv-02447

**NOTICE OF MOTION: (I) TO DISMISS
FOR LACK OF SUBJECT MATTER
JURISDICTION; (II) TO DISMISS FOR
FAILURE TO STATE A CLAIM; (III) IN
THE ALTERNATIVE, TO STRIKE THE
CLASS ACTION ALLEGATIONS; AND
(IV) TO STAY DISCOVERY PENDING
RESOLUTION OF THE MOTION**

PLEASE TAKE NOTICE that on June 19, 2017, at 9:00 a.m. or as soon thereafter counsel may be heard, the undersigned counsel for the Defendant, Creditors Relief LLC, will move before the United State District Court District of New Jersey, Civil Division, Essex County, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for an order to: (I) dismiss Plaintiff's Complaint for lack of subject matter jurisdiction; (II) dismiss Plaintiff's Complaint for failure to state a claim; (III) in the alternative, to strike Plaintiff's class action allegations; and (IV) to stay discovery pending resolution of the motion.

PLEASE TAKE FURTHER NOTICE that in support thereof, the undersigned attorney for Defendant shall rely upon the attached Memorandum of Law and the attached Certification of Suzanne Iazzetta, Esq., and any exhibits attached thereto. A proposed form of order is hereby attached.

PLEASE TAKE FURTHER NOTICE that oral argument is requested if timely opposition is filed and served. No pre-trial proceedings have been scheduled in this matter.

CREDITORS RELIEF LLC

By: /s/ Suzanne Iazzetta
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Counsel for Defendant

DATED: May 25, 2017